

Exhibit A

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING
 PLAINTIFFS' REQUEST FOR GOOGLE
 TO TAKE CERTAIN PRESERVATION
 ACTIONS**

The Honorable Alex G. Tse
 Courtroom A – 15th Floor
 Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' Joint Letter Brief regarding Plaintiffs' request that the Court order Google to negotiate with Plaintiffs to establish a preservation plan in this case and perform other preservation-related tasks ("Preservation Joint Letter Brief"). Having considered the Preservation Joint Letter Brief, and good cause having been shown, the Court GRANTS Plaintiffs' request and orders the following:

1. The Court orders the parties to exchange preservation plan proposals within one week of the date of this Order. The Court further orders that the parties provide a stipulated joint preservation plan or competing proposals to the Court within 30 days.
2. The Court orders Google to identify any relevant data sources that fall into the following categories: ESI that could be used to identify class members; ESI that could be used to identify the information Google collected from class members while they had WAA turned off; and ESI that could be used to identify the ways in which Google used the information Google collected, including Google's enrichment.
3. The Court orders that, until the parties reach an agreement on the preservation plan or the Court orders otherwise, both parties must preserve all data that falls into the following categories: ESI that could be used to identify class members; ESI that could be used to identify the information Google collected from class members while they had WAA turned off; and ESI that could be used to identify the ways in which Google used the information Google collected, including Google's enrichment.
4. The Court orders Google to preserve data for the following identified logs every 55 days, to prevent its spoliation in this case: gfstmp/gmp:tmp-app_measurement and gfstmp/gmp:tmp-app_measurement_clicks. This

1 preservation order is limited to data related to all US persons and devices who
2 disabled the WAA feature.

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4 **IT IS SO ORDERED.**

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6 DATED: _____

7 Honorable Alex G. Tse
8 United States Magistrate Judge
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